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6 Attorney for Plaintiff

7 UNITED STATES DISTRICT COURT  
8 EASTERN DISTRICT OF CALIFORNIA

9 BRIANA LOUISE COUCH,

10 Plaintiff

11 v.

12 FRANK BISIGNANO,  
13 Commissioner of Social Security,

14 Defendant  
15

Case No. 2:24-CV-01988-EFB

16 **STIPULATION AND PROPOSED**  
17 **ORDER FOR AWARD OF ATTORNEY'S**  
18 **FEES UNDER THE EQUAL ACCESS TO**  
19 **JUSTICE ACT (EAJA)**

20 IT IS HEREBY STIPULATED by and between the parties through their undersigned counsel,  
21 subject to the approval of the Court, that Plaintiff be awarded attorney fees and expenses in the  
22 amount of TEN THOUSAND dollars (\$10,000.00) under the Equal Access to Justice Act (EAJA), 28  
23 U.S.C. § 2412(d).

24 After the Court issues an order for payment of EAJA fees and expenses to Plaintiff, the  
25 government will consider the matter of Plaintiff's assignment of EAJA fees and expenses to  
26 Plaintiff's attorney. The government's ability to honor the assignment will depend on whether the  
27 fees and expenses are subject to an offset allowed under the United States Department of the  
28 Treasury's Offset Program pursuant to Astrue v. Ratliff, 130 S.Ct. 2521 (2010). After the order of  
EAJA fees and expenses is entered, the government will determine if they are subject to an offset.

If it is determined that Plaintiff's EAJA fees and expenses are not subject to an offset under  
Astrue v. Ratliff, 130 S.Ct. 2521 (2010) and the Department of Treasury's Offset Program, then the  
check for EAJA fees and expenses shall be made payable to Jacqueline A. Forslund, based upon  
Plaintiff's assignment of these amounts to Plaintiff's attorney.

1 The parties agree that whether these checks are made payable to Plaintiff or Jacqueline A.  
2 Forslund, such checks shall be mailed to Plaintiff's attorney.

3 This stipulation constitutes a compromise settlement of Plaintiff's request for EAJA attorney  
4 fees, and does not constitute an admission of liability on the part of Defendant under the EAJA or  
5 otherwise. Payment of the agreed amount shall constitute a complete release from, and bar to, any  
6 and all claims that Plaintiff and/or Plaintiff's Counsel may have relating to EAJA attorney fees in  
7 connection with this action.

8 Respectfully submitted,

9 Date: November 4, 2025

JACQUELINE A. FORSLUND  
Attorney at Law

11  
12 /s/Jacqueline A. Forslund  
JACQUELINE A. FORSLUND  
13 Attorney for Plaintiff

14 Date: November 4, 2025

KIMBERLY A. SANCHEZ  
Acting United States Attorney  
MATHEW W. PILE  
Associate General Counsel  
Office of Program Litigation, Office 7

18 /s/Noah Schabacker  
19 NOAH SCHABACKER  
20 Special Assistant United States Attorney  
21 \*By email authorization  
Attorney for Defendant

22  
23 ORDER

24 APPROVED AND SO ORDERED

25  
26 DATED: November 19, 2025

27   
EDMUND F. BRENNAN  
28 UNITED STATES MAGISTRATE JUDGE